

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION; AMERICAN CIVIL  
LIBERTIES UNION FOUNDATION OF  
COLORADO;

*Plaintiffs,*

v.

UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT,

*Defendant.*

**AFFIDAVIT OF TIMOTHY R.  
MACDONALD IN SUPPORT OF  
MOTION FOR ADMISSION  
PRO HAC VICE**

Case No. 25-cv-3271

**INTRODUCTION**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern Districts of New York, I, Timothy Macdonald, hereby swear or affirm that that:

1. I am over the age of eighteen (18) and I am fully competent and qualified to make this affidavit.
2. I am submitting this affidavit in support of my motion to practice Pro Hac Vice to appear as counsel for Plaintiff American Civil Liberties Union Foundation of Colorado in the above-captioned action.
3. As shown in the Certificate of Good Standing annexed to this filing, I am a member in good standing of the Supreme Court of the State of Colorado.
4. I have never been convicted of a felony.
5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.

6. There are no disciplinary proceedings presently against me in any state or federal court.

Dated this 23<sup>rd</sup> day of April, 2025.

Respectfully submitted,



Timothy R. Macdonald  
American Civil Liberties Foundation of Colorado  
303 E. 17<sup>th</sup> Ave., Suite 350  
Denver, CO 80203  
Telephone: 303-777-5482  
Email: tmacdonald@aclu-co.org

Subscribed and sworn to or affirmed before me this

23<sup>rd</sup> day of April in the year 2025.

NOTARY PUBLIC : MICHA STONE



4/23/2025

